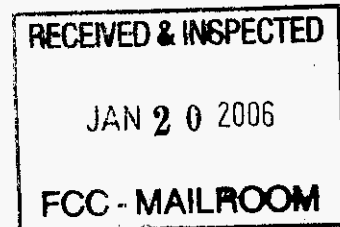




January 19, 2006



JNL-2006-001

ET Doc. No. 05-345

Commission's Secretary
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Subject: Federal Communications Commission (FCC) Public Notice: Office of Engineering and Technology Seeks Comment on Nuclear Energy Institute and United Telecom Council Request for Waiver of Section 74.832(h); DA 05-3216; December 16, 2005.

In the Matter of Nuclear Energy Institute and United Telecom Council, Request for Waiver to Permit the Use of Certified Wireless Headsets and Intercom Devices at Nuclear Facilities, dated July 20, 2005.

To Whom It May Concern:

FPL Group Inc. (FPL) operates five nuclear power units in Florida and New Hampshire and expects, soon, to complete the acquisition of a majority ownership of the Duane Arnold nuclear power unit in Iowa. FPL currently uses the TELEX intercom and wireless headset equipment for limited but critical and vital nuclear safety related needs.

FPL respectfully provides the following information in response to the above-captioned FCC Public Notice dated December 16, 2005. FPL supports the above-captioned Nuclear Energy Institute/United Telecom Council request, dated July 20, 2005, for waiver of the license eligibility requirements under Part 74 of the FCC Rules to permit continued use of certain Telex intercom and headset equipment.

It is FPL's experience that a suitable and reasonable alternative product has not been identified that possesses all of the requisite performance features, with the same level of communication capabilities, as TELEX. FPL relies on TELEX equipment as a means of reducing worker exposure to radiation, enhancing industrial safety, and contributing to overall safe nuclear plant operation.

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FPL offers the following specific comments:

- TELEX's combination of performance features include the following: wireless, hands free, full duplex, multi-users, reliable, no inadvertent actuation, uninterrupted voice transmission, ease of use, durability, extensive coverage in shielded reactor containment building (i.e., minimal dead spots), crystal clear communications, and the absence of interference with other technology that must operate the plant reactor protection system components.
- TELEX equipment provides a means to most effectively comply with U. S. Nuclear Regulatory Commission (NRC) radiation dose standards, specifically associated with maintaining radiation exposure As Low As Reasonably Achievable (ALARA) while performing critical operation and maintenance functions.
- TELEX communication equipment has been a critical component (along with video cameras, local area network ("LAN") access points, and remote monitoring electronic dosimeters) for live time monitoring and maintaining workers' exposure to radiation ALARA. Radiological safety is enhanced by health physics personnel's ability to control, monitor and communicate with workers in the field, while being able to remotely view their work activities and monitor their dose and dose rate from a central monitoring station. TELEX equipment provides the ability to communicate with the worker including how to position themselves to reduce exposure to radiation and how to perform the task at hand effectively and efficiently.
- TELEX equipment provides wireless communication at a frequency that is continuous, instantaneous, predictable, reliable, uninterruptable, noninterfering, and crystal clear. Inability to use this wireless equipment can result in increased radiation exposure to the worker and greater potential for worker error. Inability to maintain continuous, uninterruptable and clear communication can result in work stoppage and/or delays. Additional workers may be required in the work vicinity to provide the needed communication with wire type equipment or other means. This can lead to additional radiation worker exposure and can have a negative impact on the dwindling supply of contract health physics personnel.
- TELEX is used in major equipment activities and evolutions where critical communication is essential for moving and lifting nuclear components, transferring radioactive material and waste, and industrial safety such as confined space work.

- TELEX is used on mobile equipment such as cranes and refueling bridges for lifting/moving heavy/critical equipment including radioactive material such as the reactor head, pressurizer, steam generators, and irradiated fuel. Communication that is crystal clear, uninterruptable, with noninterference is paramount. Tethering between mobile platforms and equipment is not practical. Systems with wires introduce industrial safety concerns, such as tripping hazards, and the potential for increased radiation exposure associated with handling and untangling wires. Setting up of wired equipment also increases worker radiation dose.
- For plant operators, TELEX equipment reduces the chances for miscommunication or lost communications, which could lead to work stoppage, higher doses, and/or errors in conducting nuclear safety-related work activities.

FPL appreciates this opportunity to provide the above comments. Please feel free to contact Mr. Joe Danek at 561-694-4213 with any questions, or if further information is desired.

Sincerely,



Mark Warner
Vice President
Nuclear Operations Support

MW/MSD